



EQUAL OPPORTUNITIES POLICY

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Scope and Purpose

Reaffirming the organisational and behavioural principles, commitments and obligations set out in the overarching INTERSOS Safeguarding Framework, this policy specifically sets out INTERSOS' approach on **equal opportunities** in all aspects of INTERSOS' work. This includes **all aspects of employment** (e.g., recruitment, promotion, and training). INTERSOS strives toward preventing unlawful direct or indirect discrimination **on the grounds of race, sex, gender identity and expression, age, nationality, skin colour, social or ethnic origin, religion, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood, or fatherhood (including adoption), and sexual orientation.**

This policy applies to all INTERSOS employees (international, national personnel at country, regional and HQ level), interns, volunteers, consultants, contractors, and board members. The policy also applies to job applicants, potential applicants, and former employees in relation to how they shall be treated by INTERSOS. Whenever employees or staff are mentioned in this document it is intended to include all these groups of people.

For the purposes of this policy, unless otherwise stated, INTERSOS adopts the following descriptions:

- **Direct discrimination** occurs when a person is, has been or would be treated less favourably than another person in a comparable situation.
- **Indirect discrimination** occurs when an apparently neutral requirement, criterion, act, pact or general rule place a person at a particular disadvantage or in a less favourable position. Indirect discrimination can be objectively justified if the measure has a legitimate aim and appropriate methods are used.
- **Associative discrimination:** is discrimination against a person because they have an association with someone with a particular characteristic.
- **Perceptive discrimination:** is discrimination against a person because the discriminator thinks the person possesses that characteristic, even if they do not in fact do so.

Policy Statement

All employees at INTERSOS shall be respected, provided with development and progression opportunities, and work in an environment that enables them to make the most of their abilities. All employees have a responsibility in the implementation of this Policy, by setting an example to others and by promoting equality of opportunity throughout INTERSOS. Leaders and managers, have a responsibility to role model a culture of equality of opportunity. **INTERSOS is against all forms of unlawful or unfair discrimination and supports the value of equality in the workplace.** It will strive to ensure that:

- there is no discrimination against any person when they apply for jobs.
- all promotions and appointments are made on the basis of the assessed ability to do the job.
- no employee or prospective employee of INTERSOS shall receive unfair or unlawful treatment due to their race, sex, gender identity and expression, age, nationality, skin colour, social or ethnic origin, religion, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood, or fatherhood (including adoption), and sexual orientation.

INTERSOS has a zero-tolerance approach to any behaviours which compromise these basic rights and shall comply with all applicable laws, statutes, regulations, and codes from time to time in force, including all relevant Italian laws related to protection from discrimination, and applicable laws in the countries where INTERSOS operates. When the guidance in this policy conflicts with any applicable laws or regulations, the higher standard must be observed at all times.

APPLICATION

Core Principles:

This Policy is underpinned by the core principles outlined below:

- **Discrimination** in employment **is prohibited**.
- All people shall have the **right to work and advance on the bases of merit, skills, experience, and abilities**, regardless of their race, skin colour, social or ethnic origin, language, marriage or civil partnership, religion or belief, membership of a trade union, disability, personal or family care needs, pregnancy, motherhood, or fatherhood (including adoption) and sexual orientation.
- **All** INTERSOS staff, or potential applicants, are treated **fairly** and in accordance to international and local legislation¹.
- **Discriminatory bias**, prejudices or stereotyped assumptions shall not interfere with recruitment or employment decisions.
- INTERSOS has a **duty to job applicants and employees** with disabilities to help them overcome any disadvantage and barrier in the workplace, including attitudinal, organizational, or systemic, architectural or physical, information or communications, and technology.
- All INTERSOS staff share a responsibility to respect the **principle of equality and to exercise tolerance and understanding towards diversity** to enhance workplace harmony and trust.

All INTERSOS staff and associates are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework and Associated Policies. This action may include **termination of contract or summary dismissal**.

COMMITMENTS

Prevention

INTERSOS shall implement the following actions:

- Training on **Unconscious Bias** for INTERSOS staff involved in recruitment and with management responsibilities
- **Vacancy announcements** for posts shall give **sufficiently clear and accurate information** to enable potential applicants to assess their own suitability for the post. Information about vacant posts shall be provided in such a manner that does not restrict its audience.

¹ **ILO Conventions**, especially the Discrimination (Employment and Occupation) Convention, 1958, Equal Remuneration Convention, 1951 and [Declaration on Fundamental Principles and Rights at Work](#) (1998). **EU legal frameworks**, especially **Race Equality Directive** ([Directive 2000/43/EC](#)), **Framework employment Directive** ([Directive 2000/78/EC](#)) and [Council Directive 2000/78/EC](#)

- **Recruitment documents (i.e., Job descriptions, etc.) will not imply a preference for one group of applicants** unless there is a genuine occupational requirement which limits the post to a particular group or where INTERSOS is actively encouraging a greater balance of staff within a particular occupational area. In each case, this will be clearly stated.
- All descriptions and specifications for posts shall include **only requirements that are necessary and justifiable** for the effective performance of the job.
- When it is necessary to ask questions relating to personal circumstances as part of the selection process, these shall be related exclusively to job requirements and asked to all candidates.
- When applicable, reasonable adjustments to the application procedures shall be made to ensure that applicants are **not disadvantaged because of their disability**.
- All employees shall be provided **with appropriate training** about their rights to equal treatment and shall be encouraged to discuss their **career prospects and training needs** with their manager and as part of INTERSOS' Performance Management process.
- INTERSOS shall not discriminate on the basis of one's profile in the **allocation of duties** among employees employed at any level with comparable job descriptions.

Reporting

- All INTERSOS staff are **obliged to report any concerns** they have about discriminatory practice **within 24 hours** of becoming aware of an alleged incident. Failure to report to a relevant person, any suspicion of discrimination relating to someone else is a breach of INTERSOS policy and could lead to disciplinary action.
- Anyone wishing to **seek advice or clarification** about this policy shall speak to a member of the **Human Resources team** who shall advise about further procedures if required.
- Any employee who believes they are suffering any kind of discrimination shall utilise the Whistleblowing Policy and contact a member of the Human Resources Team.
- INTERSOS shall prepare a **biennial "equality report" covering** the concrete actions taken in relation to equal growth opportunities in INTERSOS workplace, equal pay for equal work, gender difference management and motherhood protection².
- Any intentionally false, malicious, or vexatious statement, misrepresentation, or accusation against another INTERSOS personnel or third party will be sanctioned.
- **Complaints can be made anonymously.** Information that identifies individuals involved in a complaint shall be limited to personnel with the absolute need to have such information and shall not be shared further without obtaining the **informed consent** of the victim/survivor, except if someone's life is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information shall be shared as per donor and regulatory body reporting requirements. Employees who breach **confidentiality** may be subject to disciplinary action up to and including termination of working contract.

Response

- **All concerns or allegations** shall always be **taken extremely seriously**, and investigated and acted upon where appropriate, through trained investigators, recognising the rights of and duty of care to everyone involved, including complainant and/or victim/survivor, witnesses, and

² Italian legal requirement for companies with over 50 employees under changes to the Equal Opportunity Code as amended by Law No. 162/2021

subject of complaint and in line with INTERSOS principles outlined in this and other relevant policies.

- Disciplinary action shall be taken against any employee who is found to have committed any act of discrimination and a serious breach of this Policy may be treated as **gross misconduct up and to dismissal**.
- The **safety and security of the victim/survivor** is the primary consideration.
- The victim/survivor shall always be **involved in decision making** and be provided with comprehensive information.
- The victim/survivor's **privacy and confidentiality** shall be protected at all times.
- All actions taken shall be guided by respect for the choices, wishes, rights and dignity of the victim/survivor.
- All allegations of discrimination at workplace, and subsequent follow-up, shall be documented in a **secure and confidential database** to ensure accountability.
- All reported allegations shall be acknowledged within 24 hours, and a team appointed by the Director of HR shall convene a case conference to assess immediate risks and decide on next steps within 72 hours.
- INTERSOS will put in place **any reasonable measures and/or adjustments** within the workplace for those employees who become disabled during employment or for persons with disabilities who are recruited in a given position. This will include, but is not limited to, consideration of the provision of specialist services, equipment, job redesign, retraining, flexible hours, and/or redeployment.
- Intimidation, harassment and bullying will not be tolerated and will lead to disciplinary action. Details of how allegations of harassment and bullying will be tackled are covered in INTERSOS' separate **'Dignity at Work' Policy**.

Support

INTERSOS recognises that employees involved in prohibited conduct at work may experience emotional or psychological reactions to their experiences. **Appropriate support** shall be made available to those concerned, including: psychological support, paid time off, work relocation/reassignment and other measures decided on a case by case basis.

Roles and Responsibilities

In addition to the roles and responsibilities outlined in the INTERSOS Safeguarding Framework, the following functions shall have dedicated responsibilities to help INTERSOS prevent and respond to behaviour or acts of direct, indirect, associative, and perceptive discrimination during the employee's period of employment with INTERSOS:

INTERSOS Board shall monitor the composition of INTERSOS personnel on annual basis and the results of its recruitment practices.

Head of Missions and HR Coordinators shall be responsible for promoting awareness of this policy within their country programmes or teams and with partners.

All INTERSOS staff and partners are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report discrimination concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework

and Associated Policies. This action may include termination of contract or summary dismissal and may result in the case being forwarded to the local authorities for criminal prosecution where appropriate and in accordance with applicable national laws.

TO REPORT A CONCERN, YOU CAN:

- Do this verbally or in writing to your Line Manager, HR, Head of Mission, mission staff with safeguarding responsibilities or
- Send an email to: complaint@intersos.org or
- Send a WhatsApp message to: +39 3808970033
- Fill an incident report and put it in one of INTERSOS feedback boxes

For reporting a complaint at mission level, please refer to the existing Complaint and Feedback Response Mechanism (CFRM) in each INTERSOS mission, which includes a dedicated email address and phone number.

REFERENCES

This policy should be read in conjunction with the following documents: Misconduct Policy, Safeguarding Framework, Code of Conduct, Charter of Values, Dignity at Work Policy, Whistleblowing and Investigation Policy, Italian Code of Equal opportunities- Legislative Decree No 198/2006, Modification to the above Italian Legislative Decree (198/2006), regarding equal opportunities between men and women at workplace 162/2021, ILO Conventions, EU legal framework.

APPROVAL AND DATES

This policy was approved on 6 December 2023. This version of the policy takes effect on 23 March 2024 and will be reviewed in 36 months' time.

POLICY OWNER

Director of Human Resources department